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16 Attorneys for Defendants

17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 CLARA HAMILTON,

20 Plaintiff,

21 vs.

22 BATTLEBORN MEDICAL
23 MANAGEMENT LLC, a Nevada limited
24 liability company; SAGEBRUSH
25 HEALTH SERVICES, a Nevada nonprofit
26 corporation,

27 Defendants.

Case No.: 2:24-cv-02378-GMN-DJA

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT
SAGEBRUSH HEALTH SERVICES TO
REPLY TO PLAINTIFF'S RESPONSE
TO DEFENDANT SAGEBRUSH
HEALTH SERVICES' MOTION FOR
SUMMARY JUDGMENT
(FIRST REQUEST)**

28 **IT IS HEREBY STIPULATED** by and between Defendant Sagebrush Health
Services ("Defendant") and Plaintiff Clara Hamilton ("Plaintiff"), by and through their
respective counsel of record, that Defendant shall have until January 9, 2026 to file its Reply
to Plaintiff's Response to Defendant Sagebrush Health Services' Motion for Summary
Judgment. This Stipulation is submitted and based upon the following:

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2 1. Plaintiff's Complaint was filed in the United States District Court, District of
3 Nevada on December 19, 2024, and asserted claims related to Plaintiff's employment with
4 Defendant. (ECF No. 1).

5 2. On November 21, 2025, Defendant filed a Motion for Summary Judgment,
6 arguing that it was not Plaintiff's employer nor that it controlled Plaintiff's employment with
7 Defendant Battleborn Medical Management LLC. (ECF No. 36).

8 3. On December 10, 2025, the parties stipulated to an extension for Plaintiff to
9 file her response to Defendant Sagebrush Health Services' motion for summary judgment.
10 (ECF No. 40.)

11 4. On December 11, 2025, the Court granted the extension. (ECF No. 41.)

12 3. On December 19, 2025, Plaintiff filed their Response to the Motion for
13 Summary Judgment. (ECF No. 42).

14 4. Defendant's counsel requires additional time to complete the reply due to
15 Christmas and New Years Eve holidays, where Defendant's counsel's office is closed for a
16 portion of said holidays and the fact the Response includes additional new information which
17 defense counsel needs to review the Defendant. The extension will allow for sufficient time
18 to provide an accurate reply without prejudicing either party. Accordingly, Defendant
19 respectfully requests a brief extension to the deadline to reply to Plaintiff's response.

20 5. The Parties have agreed to extend the deadline for Defendant to file its
21 response to Plaintiff's response to Defendant's Motion for Summary Judgment by one-week,
22 from January 2, 2026 to January 9, 2026, based upon Defendants pre-existing scheduling
23 conflicts and the need to review recently received information pertinent to the response.

24 6. This is the first stipulation to extend the time for Defendant to reply to
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27
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Plaintiff's Response to Sagebrush Health Services' Motion for Summary Judgment.

7. The Parties believe these circumstances constitute good cause for granting an extension. See Fed. R. Civ. P. 6(b)(1).

8. This Stipulation is made in good faith and not for the purpose of delay.

The parties hereby stipulate to the aforementioned.

DATED this <u>23rd</u> day of December, 2025	DATED this <u>23rd</u> day of December, 2025
GREENBERG GROSS LLP	WHITEHEAD & WHITEHEAD PLLC
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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: December 23, 2025

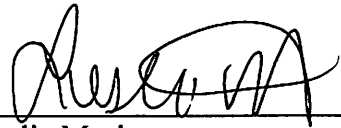
CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Law offices of Whitehead & Whitehead PLLC and that on this date, I served the foregoing *Stipulation to Extend Deadline for Defendant Sagebrush Health Services to Reply to Plaintiff's Response to Defendant Sagebrush Health Services' Motion For Summary Judgment (First Request)*, on the party(ies) set forth below via Pacer Electronic filing system addressed as follows:

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DATED this 23rd day of December, 2025.



Leslie Morin
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